

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.**

In the Matter of)	
)	
Signal Point Corp.)	WC Docket No. 13-152
)	
Section 63.71 Application to Discontinue)	
Certain Domestic Telecommunications)	
Services)	

**SECTION 63.71 APPLICATION SUPPLEMENT AND
RESPONSE TO COMMENTS**

Signal Point Corp. (hereinafter “SPC” or “Company”), in accordance with Section 63.71 of the Federal Communications Commission’s (“Commission”) rules, hereby supplements its application and responds to certain comments submitted in the docket with respect to SPC’s discontinuance of provision of retail and wholesale calling card services.

I. BACKGROUND

On May 31, 2013, SPC filed its initial application to discontinue the provisioning of retail and wholesale calling card services throughout the United States (“Application”). SPC anticipated that this process would be completed prior July 31, 2013 and believed it had adequate time to allow the 214 process to conclude prior to its commitments with vendors and facilities providers that required the company’s ending such services prior to August 15, 2013. In good faith, the company filed the Application with the Commission and began the unwieldy process of informing customers.¹ During this time, and continuing to the present, the Company also offered

¹ As noted in the Company’s Application, the unique nature of calling card services made it impossible to directly inform customers by mail as many users are anonymous.

refunds to any customer seeking one and sent out checks to the customers for the balance remaining on the PIN after validating the PIN had been activated and was valid.²

II. SUPPLEMENT

After the Company's filing, it fell into "Red Light" status several times. This prevented the application from being acted upon until the end of July, drastically throwing off the Company's timetable. The Company was faced with the choice of issuing refunds to customers and paying vendors or paying the Commission the regulatory fees. Given this choice, the Company chose to pay its telecommunications vendors and issue customer refunds. However, due to these delays, the Company began to come dangerously close to its obligations to other telecommunications vendors and facilities vendors to end our service arrangements. In particular, the Company was required to exit its switching facility and main network hub housing all of its calling card equipment no later than August 17, 2013, effectively meaning that these services had to cease on August 14, 2013. The Company was unable to extend this deadline without considerable expense and liability which not only would have impacted its ability to provide service and refunds to customers, but would have put far too much stress on the company financially.

Due to these deadlines, on or about July 31, 2013, certain calling card services began to be impacted and calls could not complete.³ When a customer called with an issue, the company would immediately issue a refund after the validating the PIN. Indeed, the Company has issued refunds on PINs that are expired so long as the customer has a balance on the card as most cards

² Each calling card contains a PIN, a unique number that identifies the card and the balance.

³ It is impossible for the Company to determine which PINs were impacted as customers would frequently use other numbers available to customer from our website or on the card itself.

issued by the company expired within six months. The Company will continue issuing these refunds to any valid PIN.

At this point, due to the Company's contractual obligations, the Company cannot restore service to individuals with PINs. Its equipment is unable to be powered back up without substantial cost and modification and it is questionable that it would work. Moreover, the Company's staff has been reduced to approximately four individuals and the Company does not possess the resources to adequately monitor and assist customers in this service and certainly not the high degree of services our customers were use to as evidenced by some of the comments submitted in this docket.

While the Company regrets that some customers have been impacted by this discontinuance, the Company notes that this is not a primary line service and there are a vast number of options for consumers. While customers regrettably suffered an inconvenience, access to vital 911 and emergency services would not have been impacted. While the Company does not know how many customers were impacted due to the nature of the services, the Company has committed to issue refunds to ever valid PIN presented to the Company.⁴ Most PINs were for face values of between \$5 and \$20 and refunds are falling in that range or below for the majority of customers. As of the date of this Supplement, the Company has issued over \$3000.00 in refunds to customers and will continue to do so until customers are satisfied. While ideally the Company would have preferred to end service as of the date of approval, the Company believes it acted in the public interest by not generating more invoices from telecommunications service providers that may be paid untimely and continuing to honor the balance remaining on the PINs by issuing full refunds to the customers.

⁴ The anonymous nature of the service and its portability combined with the fact that a customer may have several cards that are expired or unexpired makes an estimate difficult if not impossible.

III. REFUND PROCESS

As stated previously, the Company is committed to issuing refunds to every customer with a valid PIN contacting us. The Company has adequate resources to honor these requests and will continue to honor refunds request received on valid PINs. The company has maintained its records related to these services and has the ability to validate if a PIN has a balance left on it and if the PIN has expired. In order to obtain a refund, customers have several options:

a. Mail: Customers should send the Company a letter with their Name, PIN, address where they would like a refund sent and a contact phone number or email address where they can be reached in case of any issues to:

**Signal Point Corp.
Continental Plaza - 6th Floor
433 Hackensack Avenue
Hackensack, NJ 07601
Attn: Calling Card Refunds**

b. Email: Customers should send an email to the company at **cardrefunds@sigpt.com** with their Name, PIN, address where they would like a refund sent and a contact phone number or email address where they can be reached in case of any issues.

c. Phone: Customers can call (877) 323-2486 and leave a voicemail message with their Name, PIN, address where they would like a refund sent and a contact phone number or email address where they can be reached in case of any issues.

The Company will issue refunds normally within two weeks of receiving a request, depending on volume.

IV. RESPONSE TO COMMENTS

As of the date of this filing, comments were submitted by Mr. Riendeau, Mr. Nichols, Ms. Clark and Ms. Mazzeo, Fortier and Atinuke.⁵ Late filed comments were submitted by Elke Gudath. The comments are substantially similar in that they protest the Company's discontinuance of service and note that they have amounts left on their cards that they cannot use.

SPC will issue you a full refund of any amounts remaining on these PINs as it has committed to do with any valid PIN. The Company will reach out to these customers and inform them of this or, if they have provided enough information in the comment, provide a refund immediately.

SPC appreciates the business and regrets that it had to discontinue service to calling card customers, but such discontinuance was necessary under the circumstances. There are many low cost and reputable calling card providers providing cards on a local, regional and national level that they will be able to service from.

⁵ The comments of Fortier and Atinuke were filed in WC Docket No. 13-151 regarding different services but appear to be responsive to this docket. Accordingly, SPC has responded to these comments here as well.

WHEREFORE, Signal Point Corp., for the reasons contained herein, believes has acted in the public interest as reasonable and necessary given the circumstances.

Respectfully submitted, this 28th day of August 2013.

Signal Point Corp.

By: _____/s/_____

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